

SOL: CMM
(08)01944

UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF NEW YORK

SECRETARY OF LABOR,
United States Department of Labor,

Plaintiff,

v.

Civil Action File

No. 08-CV-267 (RJA) (HBS)

SECURITY CREDIT SYSTEMS, INC. and
ANGELO J. TRAVALE JR., Individually,

Defendants.

DECLARATION OF MARTIN MURRAY

I MARTIN MURRAY, being duly sworn, declare under penalty of perjury that the following is true and correct:

1. I am an investigator with the Wage and Hour Division, Employment Standards Division of the United States Department of Labor. This Declaration is submitted in opposition to Defendants' Motion to Compel Plaintiff's Disclosure.

2. This Declaration is based upon my personal knowledge obtained from my participation in this matter and my review of the files in the instant case.

3. In my capacity as an investigator for the Wage and Hour Division, I conducted an investigation of the Defendants' workplace and employment policies.

4. The investigation was initiated because of information our office received that the Defendants were not paying their employees in accordance with the Fair Labor Standards Act.

5. As part of my investigation, I spoke with a number of present and former employees of the Defendants and secured statements from them. In doing so, I also compiled a list of the informants and generated notes regarding my interactions with them.

6. My investigation was undertaken with the knowledge that its findings, and the documents it generated, could potentially need to be submitted to the Solicitor's Office so that litigation could be commenced against the Defendants.

Executed on the 2nd day of February, 2009

By:

Martin Murray
MARTIN MURRAY